
**UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA**

Zoe Kaplan, Jack Flom, and Samira,
Hassan, *on behalf of themselves and other
similarly situated individuals,*

Plaintiffs,

v.

Minnesota Department of Public Safety,
Commissioner John Harrington, *in his
individual and official capacity*;
Minnesota Department of Natural
Resources Commissioner Sarah Strommen,
in her individual and official capacity;
Minnesota State Patrol Colonel Matthew
Langer, *in his individual and official capacity*;
Hennepin County Sheriff David Hutchinson,
in his individual and official capacity;
John Does 1-10, *in their individual and
official capacities*;

Defendants.

Ct. No. 22-cv-00640 (JRT/JFD)

**HENNEPIN COUNTY
SHERIFF DAVID
HUTCHINSON’S MOTION
TO DISMISS**

PLEASE TAKE NOTICE that Defendant Hennepin County Sheriff David Hutchinson (“Sheriff Hutchinson”) moves to dismiss pursuant to Rule 12(b)(6) of the Federal Rules of Civil Procedure. The motion is based on the records and file of this case, including Sheriff Hutchinson’s Memorandum of Law in support of this motion and any argument that may be made at a hearing on this motion.

MICHAEL O. FREEMAN
Hennepin County Attorney

Dated: May 16, 2022

By: /s/ Sarah McLaren
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